

DENIS M. VANNIER, OSB #044406
Senior Deputy City Attorney
denis.vannier@portlandoregon.gov
NAOMI SHEFFIELD, OSB #170601
Senior Deputy City Attorney
naomi.sheffield@portlandoregon.gov
Portland City Attorney's Office
1221 SW 4th Ave., Rm. 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089
Attorneys for Defendant City of Portland

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

INDEX NEWSPAPERS LLC, a Washington limited-liability company, dba **PORTLAND MERCURY**; **DOUG BROWN**; **BRIAN CONLEY**; **MATHIEU LEWIS-ROLLAND**; **KAT MAHONEY**; **SERGIO OLMOS**; **JOHN RUDOFF**; **ALEX MILAN TRACY**; **TUCK WOODSTOCK**; **JUSTIN YAU**; and those similarly situated,

Plaintiffs,

v.

CITY OF PORTLAND, a municipal corporation; **JOHN DOES 1-60**, officers of Portland Police Bureau and other agencies working in concert; and **JOHN DOES 61-200**, federal agents,

Defendants.

Case No. 3:20-cv-1035-SI

SECOND JOINT STATUS REPORT

Pursuant to this court's order of October 7, 2024, (Dkt. 305), the parties submit this joint status report to update this court on the status of the parties' settlement discussions.

The parties' settlement negotiations have continued to be productive but have not yet resulted in agreement. The parties intend to continue negotiating. However, the parties expect that several factors, including approaching holidays and the City of Portland's transition to a new form of government, will likely delay the parties' ability to reach agreement in the short term. The parties therefore respectfully request leave to submit a joint status report on or before January 10, 2025, to update this court on the status of settlement discussions and, if necessary, propose a new discovery and briefing schedule at that time.

DATED: November 7, 2024

By: /s/ Denis M. Vannier
DENIS M. VANNIER, OSB #044406
Senior Deputy City Attorney
NAOMI SHEFFIELD, OSB #170601
Senior Deputy City Attorney
Of Attorneys for Defendant City of Portland

By: /s/ Matthew Borden [authorized signature]
Matthew Borden, *pro hac vice*
BRAUNHAGEY & BORDEN LLP
Kelly K. Simon, OSB No. 154213
ACLU FOUNDATION OF OREGON
Of Attorneys for Plaintiffs